

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. 6474

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO,

Debtor.

PROMESA

Title III

No. 17 BK 3566-LTS

Re: ECF No. 467

**INFORMATIVE MOTION REGARDING ATTENDANCE AT  
MAY 1, 2019 HEARING**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gail Dein:

The Puerto Rico Fiscal Agency and Financial Advisory Authority, as representative of the Commonwealth of Puerto Rico and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico under the authority granted to it under Act 2-2017, as well as on its own behalf, through the undersigned counsel, hereby submit this informative motion in response to the Court's *Order Regarding Procedures for May 1, 2019 Hearing* [Case No. 17-3283, Docket No. 6474; Case No. 17-3566, Docket No. 467] (the "Scheduling Order") and respectfully state as follows:

1. William J. Sushon of O'Melveny & Myers LLP intends to appear in person in the Boston courtroom at the May 1, 2019 hearing and seeks to be heard on, as necessary, the following matters:

- a) *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1 to 4 [Attorney-Client Privilege, Attorney Work Product, Common Interest]* [Case No. 17-3283, Docket No. 6253; Case No. 17-3566, Docket No. 443]; and
- b) *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Compel Production of Documents in Privilege Log Categories 1, 5 to 7 [Deliberative Process Privilege and Executive Privilege]* [Case No. 17-3283, Docket No. 6320; Case No. 17-3566, Docket No. 446].

2. Peter Friedman of O'Melveny & Myers LLP also intends to appear in person in the Boston courtroom but does not seek to be heard.

3. Carolina Velaz-Rivero and/or María Álvarez-Santos of Marini Pietrantoni Muñiz LLC intend to appear at the May 1, 2019 hearing in the San Juan courtroom but do not seek to be heard.

Dated: April 26, 2019  
San Juan, Puerto Rico

/s/ William J. Sushon

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